

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

**Application Review**

**Issue Date:**

**Region:** Washington Regional Office  
**County:** Craven  
**NC Facility ID:** 2500171  
**Inspector's Name:** Robert Bright  
**Date of Last Inspection:** 04/30/2019  
**Compliance Code:** 3 / Compliance - inspection

<b>Facility Data</b>	<b>Permit Applicability (this application only)</b>
<p><b>Applicant (Facility's Name):</b> Weyerhaeuser NR Company - New Bern Lumber Facility</p> <p><b>Facility Address:</b>  Weyerhaeuser NR Company - New Bern Lumber Facility  1785 Weyerhaeuser Road  Vanceboro, NC 28560</p> <p><b>SIC:</b> 2499 / Wood Products, Nec  <b>NAICS:</b> 321999 / All Other Miscellaneous Wood Product Manufacturing</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>	<p><b>SIP:</b> 02D .0515, .0516, .0521, .1111, .1806  <b>NSPS:</b> NA  <b>NESHAP:</b> DDDD  <b>PSD Avoidance:</b> NA  <b>NC Toxics:</b> NA  <b>112(r):</b> NA</p>

<b>Contact Data</b>			<b>Application Data</b>
<b>Facility Contact</b>	<b>Authorized Contact</b>	<b>Technical Contact</b>	<p><b>Application Number:</b> 2500171.19A  <b>Date Received:</b> 03/29/2019  <b>Application Type:</b> Renewal  <b>Application Schedule:</b> TV-Renewal  <b>Existing Permit Data</b>  <b>Existing Permit Number:</b> 08043/T12  <b>Existing Permit Issue Date:</b> 01/23/2015  <b>Existing Permit Expiration Date:</b> 12/31/2019</p>
<p>Jack Godwin  Environmental Manager  (252) 746-7217  1785 Weyerhaeuser Road  Vanceboro, NC 28560  jack.godwin@weyerhaeuser.com</p>	<p>Jason Watters  Mill Manager  (252) 633-7276  1785 Weyerhaeuser Road  Vanceboro, NC 28560  jason.watters@weyerhaeuser.com</p>	<p>Jack Godwin  Environmental Manager  (252) 746-7217  1785 Weyerhaeuser Road  Vanceboro, NC 28560  jack.godwin@weyerhaeuser.com</p>	

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2017	2.95	31.88	143.72	60.17	18.92	13.75	7.81 [Methanol (methyl alcohol)]
2016	3.07	33.28	151.55	62.85	19.93	14.51	8.24 [Methanol (methyl alcohol)]
2015	2.92	31.70	130.50	59.71	16.52	12.51	7.08 [Methanol (methyl alcohol)]
2014	2.59	28.09	128.46	53.03	15.39	12.31	6.99 [Methanol (methyl alcohol)]
2013	2.02	21.80	115.93	41.42	14.39	11.09	6.31 [Methanol (methyl alcohol)]

<p><b>Review Engineer:</b> Eric Crump</p> <p><b>Review Engineer's Signature:</b> _____ <b>Date:</b> _____</p>	<p style="text-align: center;"><b>Comments / Recommendations:</b></p> <p><b>Issue</b> 08043/T13  <b>Permit Issue Date:</b>  <b>Permit Expiration Date:</b></p>
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## 1. Purpose of Application

Weyerhaeuser NR Company - New Bern Lumber Facility (hereafter referred to as Weyerhaeuser New Bern Lumber) is a lumber mill located in Vanceboro, Craven County, North Carolina. The facility operates under Title V Permit No. 08043/T12 with an expiration date of December 31, 2019. Weyerhaeuser New Bern Lumber has applied for renewal of their facility's air quality permit. The renewal application was received on April 1, 2019, or at least six months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

Through permit application No. 2500171.19A, Weyerhaeuser New Bern Lumber included the following changes to the existing permit:

- Addition of an electric wood chipper (Source ID No. IES-14) as an insignificant source.
- Sending wood chips to the adjacent pulp mill through the green screening bin (IES-12) and the green wood truck loadout (IF-8) when the conveyor is not operational.
- Removal of Prevention of Significant Deterioration (PSD) annual emission reporting requirements (15A NCAC 02D .0530(u)) from the permit.

## 2. Facility Description

Weyerhaeuser New Bern Lumber is a typical sawmill located adjacent to the International Paper Pulp Mill in Vanceboro. Tree-length and precut logs brought to the sawmill are cut, debarked, and cut into rough lumber of various sizes. Bark from the debarking process is sold; wood trimmings are sent to a chipper and chip screener, and conveyed to the adjacent pulp mill.

The rough-cut lumber is sent to one of two kilns for drying. Each kiln has a sawdust-fired burner, and is capable of drying up to 65 million board feet of lumber per year. The dried lumber is then planed to remove surface wood discolored in the drying process and to bring the lumber to its final dimension. The lumber is then cut to final length before loading onto trucks for shipment.

The facility currently operates two shifts per day, five days each week. Planer mill and sawmill maintenance down-days are typically performed on Monday and Friday, respectively.

## 3. Application Chronology

January 23, 2015	Air Permit No. 08043/T12 issued to Weyerhaeuser New Bern Lumber.
May 7, 2015	Compliance inspection conducted by Robert Bright, Washington Regional Office (WaRO). Facility appeared to be operating in compliance with all permit requirements.
May 3, 2016	North Carolina Division of Air Quality (DAQ) receives email from Jack Godwin of Weyerhaeuser New Bern Lumber requesting DAQ determine if a permit application is required for the addition of a new wood chipper at the facility.
May 9, 2016	DAQ issues Permit Applicability Determination #2837 that the wood chipper qualifies as an insignificant source. A permit application is not required for the addition of the source.

June 23, 2016	Compliance inspection conducted by Robert Bright, WaRO. Facility appeared to be operating in compliance with all permit requirements.
June 28, 2017	Compliance inspection conducted by Robert Bright, WaRO. Facility appeared to be operating in compliance with all permit requirements.
September 19, 2017	DAQ receives letter from Jason Watters of Weyerhaeuser New Bern Lumber requesting an applicability determination for a green woodchip screening bin and a green woodchip truck loadout.
September 26, 2017	DAQ issues Permit Applicability Determination #3130 that the green woodchip screening bin and green woodchip truck loadout both qualify as insignificant sources. A permit application is not required for the addition of the sources.
April 17, 2018	Compliance inspection conducted by Robert Bright, WaRO. Facility appeared to be operating in compliance with all permit requirements.
April 1, 2019	Permit renewal application No. 2500171.19A received by WaRO.
May 22, 2019	Draft permit and review sent to Weyerhaeuser New Bern Lumber and WaRO for review and comment.
May 28, 2019	Weyerhaeuser New Bern Lumber submits comments on draft permit and review to DAQ.

#### 4. Permit Modifications and Title V Equipment Editor (TVEE) Discussion

The following table summarizes changes to the Weyerhaeuser New Bern Lumber permit as a result of this permit renewal:

Page No.	Section	Description of Changes
Cover and throughout	---	<ul style="list-style-type: none"> <li>Updated all dates and permit revision numbers</li> <li>Changed all citations of 15A NCAC 2D to 15A NCAC 02D</li> <li>Changed all citations of 15A NCAC 2Q to 15A NCAC 02Q</li> </ul>
Insignificant Activities List	Attachment	<ul style="list-style-type: none"> <li>Added Source ID No. IES-14, Electric wood chipper</li> <li>Changed description of Source ID No. IES-12 from “Green sawdust bin” to “Green sawdust screening bin”</li> <li>Changed source description of Source ID No. IF-8 from “Green sawdust truck” to “Green wood truck loadout”</li> </ul>
3	1	Deleted “Subpart” between “MACT” and “DDDD”
4	2.1 A.1.a	Updated section to reflect the most current stipulations for 15A NCAC 02D .0515
4-5	2.1 A.1.c, d	Revised section to include the most current stipulations for 15A NCAC 02D .0515
5	2.1 A.4	Removed emission reporting requirement (15 NCAC 02D. 0530(u)) for avoiding applicability of PSD requirements; renumbered Section 2.1 A.5 to 2.1 A.4
6	2.1 B.1.e.	Revised section to include the most current stipulations for 15A NCAC 02D .0512
7	2.1 B.2.c, e	Revised section to include the most current stipulations for 15A NCAC 02D .0521

Page No.	Section	Description of Changes
9-18	3	Updated General Conditions to version 5.3 dated August 21, 2018

The following changes were made to the Title V Equipment Editor (TVEE):

- Changed source description of Source ID No. IES 12 from “Green sawdust bin” to “Green sawdust screening bin”.
- Changed source description of Source ID No. IF-8 from “Green sawdust truck” to “Green wood truck loadout”.

## 5. Description of Changes and Estimated Emissions

Since the previous permit renewal, the only changes to the Weyerhaeuser New Bern Lumber facility have been the addition of three insignificant activities to the facility. Per Permit Applicability Determination #2837 of May 9, 2016, a new electric wood chipper (ID No. IES-14) was determined by DEQ to be an insignificant activity as defined by 15A NCAC 02Q .0503(8) (i.e., its emissions would not violate any applicable emissions standard, its potential emission of any criteria pollutant does not exceed 5 tons per year, and its potential emissions of any HAP are each below 1000 pounds per year). Per Permit Applicability Determination #3130 of September 26, 2017, DEQ determined that a green woodchip screening bin (IES-12) and green woodchip truck loadout (IF-8) were both insignificant activities. These activities have had no significant impact on potential emissions at the facility

## 6. Regulatory Review

The following regulations apply to the Weyerhaeuser New Bern Lumber facility, in addition to the requirements in the General Conditions:

- 15A NCAC 02D .0512 "Particulates from Wood Products Finishing Plants"
- 15A NCAC 02D .0515 "Particulates from Miscellaneous Industrial Processes"
- 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
- 15A NCAC 02D .0521 "Control of Visible Emissions"
- 15A NCAC 02D .0530(u) "Prevention of Significant Deterioration" (Use of Projected Actual Emissions) – *See Section 9 below for additional rule applicability discussion.*
- 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (40 CFR Part 63 Subpart DDDD)
- 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions"

This review does not provide an extensive review for each applicable regulation because the facility’s status with respect to these regulations has not changed. The permit will be updated to reflect the most current stipulations for all applicable regulations. There have been no changes at Weyerhaeuser New Bern Lumber that subject the facility to additional regulations.

## 7. NESHAPS/MACT/GACT

Although Weyerhaeuser New Bern Lumber does not produce plywood or composite wood products, the lumber kilns at this facility are subject to 40 CFR Part 63, Subpart DDDD, "National Emission Standards for Hazardous Air Pollutants (NESHAP) for Plywood and Composite Wood Products"(40 CFR 63.2231(a)). However, per 40 CFR 63.2252, lumber kilns are not subject to any requirements under this NESHAP other than the initial notification requirements of 40 CFR 63.9(b). This permit renewal does not affect this status. Continued compliance is expected.

## **8. New Source Performance Standards (NSPS)**

No sources at the facility are subject to NSPS. This permit renewal does not affect this status.

## **9. New Source Review (NSR)/Prevention of Significant Deterioration (PSD)**

Weyerhaeuser had been considered to have the potential to emit more than 250 tons per year of volatile organic compounds (VOC). As part of the 2500171.09B permit application in 2009, Weyerhaeuser New Bern Lumber avoided applicability of PSD by estimating that future operations of the facility would not exceed PSD limits for VOC pursuant to 15A NCAC 02D .0530(u). To demonstrate compliance, a condition was added to the permit requiring records of annual VOC emissions to be collected and reported for five years following resumption of normal operations at the facility.

Through permit application No. 2500171.19A, Weyerhaeuser New Bern Lumber has requested the PSD annual VOC emission reporting requirements be removed from the permit. According to the previous permit review for this facility (Air Permit No. 08043/T12, Russell Braswell, January 23, 2015), and the 2015 permit inspection report (Robert Bright, May 14, 2015), the facility submitted the required reports during the five-year period 2010-2015, and the reports demonstrated emissions VOC would be less than 250 tons per year. Continued compliance is expected. The VOC emission reporting requirement under 15A NCAC 02D .0530(u) will be removed from the permit.

## **10. Risk Management Program (Clean Air Act, Section 112(r))**

40 CFR Part 68 establishes requirements for stationary sources that hold more than threshold quantities of regulated substances to develop a risk management plan (RMP), in accordance with Section 112(r) of the Clean Air Act. The RMP identifies the potential effects of a chemical accident, steps the facility is taking to prevent an accident, and emergency response procedures if an accident occurs.

Weyerhaeuser New Bern Lumber does not handle, store, or use any 112(r) pollutants in sufficient quantity to be subject to this regulation. This permit renewal does not affect this status. Continued compliance is expected.

## **10. Compliance Assured Monitoring (CAM)**

40 CFR Part 64 establishes requirements for compliance assurance monitoring (CAM). This rule applies to any pollutant specific unit that meets the following three conditions:

- the unit is subject to any (non-exempt: e.g. pre-November 15, 1990, Section 111 or Section 112 standard) emission limitation or standard for the applicable regulated pollutant.
- the unit uses any control device to achieve compliance with any such emission limitation or standard.
- the precontrol potential emission rate for the unit exceeds either 100 tons per year for criteria pollutants, 10 tons per year of a single HAP, or 25 tons per year of multiple HAPs.

The permit review for 08043/T04 (Mark Cuilla, January 3, 2006) documents that CAM does not apply to any control device at this facility. No changes have occurred to any control devices at the facility since that time that warrant CAM. This permit renewal does not change this status.

## **11. Facility-wide Toxics Review**

The preceding review for Air Permit No. 08043/T12 (Russell Braswell, January 23, 2015) notes TAP emission modeling was conducted for Weyerhaeuser New Bern Lumber most recently in 2011. The modeling demonstrated that this facility could comply with Acceptable Ambient Level (AAL) requirements as long as annual kiln production did not exceed 130 million board-feet. Weyerhaeuser New Bern Lumber had stated in the

modeling application that 130 million board-feet/year is the maximum production capacity of the kilns at the facility. At that time, references to 15A NCAC 02D .1100 “Control of Toxic Air Pollutants” were removed from the permit, and the equipment list for the facility was updated to include the 130 million board-feet/year kiln maximum capacity. This permit renewal does not affect this status. Continued compliance is expected.

## **12. Facility Emissions Review**

As stated in Section 5 of this review, there have been no significant changes to potential emissions from this facility. The table on the header page of this review summarizes actual emissions for Weyerhaeuser New Bern Lumber after application of required emission controls. Continued compliance is expected.

## **13. Compliance Status**

The facility was last inspected on April 17, 2018 by Robert Bright, WaRO. The company appeared to be in compliance with all applicable permit requirements at that time. No Notices of Violation or Notices of Deficiency have been issued to the facility since the last permit renewal

## **14. Public Notice/EPA and Affected State(s) Review**

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Consistent with 15A NCAC 02Q .0525, the EPA will have a concurrent 45-day review period. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA. Also, pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice is provided to the public under 02Q .0521 above. There are no affected states or local programs within 50 miles of the facility.

## **15. Other Regulatory Considerations**

A P.E. seal was not required for Permit Application No. 2500171.19A.

A zoning consistency determination was not required for Permit Application No. 2500171.19A.

A permit fee was not required for Permit Application No. 2500171.19A.

## **16. Recommendations**

DAQ has reviewed the permit application for Weyerhaeuser NR Company - New Bern Lumber Facility located in Vanceboro, Craven County to determine compliance with all procedures and requirements. DAQ has determined that this facility is complying or will achieve compliance, as specified in the permit, with all requirements that are applicable to the affected sources. DAQ recommends the issuance of Air Permit No. 08043/T13.